

# **Exhibit A**

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the  
Northern District of Georgia  
Civil Division

FILED IN CLERK'S OFFICE  
U.S.D.C. - Atlanta

AUG 13 2019

JAMES N. HATTEN, Clerk

By: J. Brannon Deputy Clerk

Douglas Emery Adams

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Equifax, Inc., et al

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

1:19-CV-3682

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Douglas Emery Adams
Street Address	c/o 519 Colgate Drive
City and County	Allen, Collin County
State and Zip Code	Texas [ 75013 ]
Telephone Number	214-664-8112
E-mail Address	dadams06@gmail.com

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

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**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

**Defendant No. 1**

Name	Equifax, Inc.
Job or Title ( <i>if known</i> )	
Street Address	1550 Peachtree Street Northwest
City and County	Atlanta, Fulton County
State and Zip Code	Georgia 30309
Telephone Number	404-885-8000
E-mail Address ( <i>if known</i> )	

**Defendant No. 2**

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

**Defendant No. 3**

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

**Defendant No. 4**

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

Pro Se I (Rev. 12/16) Complaint for a Civil Case

E-mail Address *(if known)***II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Douglas Emery Adams, is a citizen of the State of *(name)* Texas

**b. If the plaintiff is a corporation**

The plaintiff, *(name)*, is incorporated under the laws of the State of *(name)* and has its principal place of business in the State of *(name)*

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

The defendant, (name) \_\_\_\_\_, is a citizen of  
 the State of (name) \_\_\_\_\_. Or is a citizen of  
 (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) Equifax, Inc., is incorporated under  
 the laws of the State of (name) Georgia, and has its  
 principal place of business in the State of (name) Atlanta.  
 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
 and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Equifax, Inc. has willingly, knowingly, intentionally, or voluntarily agreed and acquiesced through its non-response to the facts stated in the Conditional Acceptance/ Affidavits sent, and is therefore in default under contract. Equifax has also admitted to the data breach which has affected and injured me personally.

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See attached exhausted/ completed administrative remedy/ procedure: Conditional Acceptance, Notice of Fault & Opportunity to Cure and subsequent Affidavit and Notice of Default. Plaintiff has exhausted his/her private Administrative remedy/rocedure and through the Defendants non-response, acceptance and commercial aquiescnese of the facts as outlined in the Affidavit and Notice of Default. Defendants were afforded commercial grace and an opportunity to provide the requested proofs of claims and failed to provide proofsof claim as enumerated in the Conditional Acceptance sent to Defendant via certified mail # 7018 2290 0002 2315 0217 and received by Defendant on March 28<sup>th</sup>, 2019. Defendants were then sent a Notice of Fault and Opportunity to Cure the fault and failed to respond. Through Defendants non-response and sielnece, the Defendants have quietly agreed to all of the facts as outlined in the Notice of Default. Therefore the Plaintiff states a superior claim upon which relief can be granted and the Defedants fail to state a claim upon which relief can be granted.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff prays for relief as follows \$75,000,000.00 agreed to and acquiesced by Equifax, Inc through the Plaintiff exhausting his/her private administrative remedy through request proofs of claim, Equifax, Inc's subsequent non-response to the Notice of Fault and Opportunity to Cure and subsequent non-response and subsequent Default as a result of Equifax, Inc. willful failure to respond. Plaintiff also pray for triple damages, punitive damages and all court costs.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/29/2019

Signature of Plaintiff

Printed Name of Plaintiff

Douglas Emery Adams

**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

Pro Se I (Rev. 12/16) Complaint for a Civil Case

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State and Zip Code

Telephone Number

E-mail Address



Conditional Acceptance # CA-090817-EQUIFAX

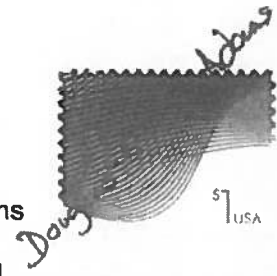
#1

Certified Mail No. 7018 2290 0002 2315 0271

Monday, March 25, 2019

To: Mark Begor, CEO  
EQUIFAX, INC.  
1550 PEACHTREE ST NW  
ATLANTA, GA, 30309-2468

From: Douglas-Emery: Adams  
519 Colgate Drive  
Allen, Texas [ 75013 ]  
Non-Domestic / Non Assumpsit



RE: CONDITIONAL ACCEPTANCE (CA) - REQUEST FOR PROOF OF CLAIM AS TO THE LIABILITY OF EQUIFAX, INC. FOR THE FRAUDULENT BREACH OF THE PERSONAL DATA OF 148 MILLION AMERICANS INCLUDING MYSELF, THE UNDERSIGNED, AS REPORTED ON SEPTEMBER 8, 2017 BY EQUIFAX, INC.

Dear Equifax, Inc.

I'm am a victim of the fraudulent data breach that occurred at your company and was reported six months later on September 8, 2017. I am personally, financially, socially and economically injured by this data breach in that I now DO NOT know who may have my personal data or where my data is being used as a result of the fraudulent data breach at Equifax, Inc. reported on September 8, 2017. I seek Proof of Claim in the nature of exhausting my private administrative remedy from your Office as to the torts committed by Equifax, Inc. against my estate. I want to resolve this matter as soon as possible and I can only do so conditioned upon you Equifax, Inc. providing Proof of Claim.

As necessary, the Proofs of Claim are enumerated below:

1. PROOF OF CLAIM that on September 8, 2017 Equifax, Inc. did NOT report that over 148 Million Americans' personal data housed by Equifax, Inc. had been stolen and/or compromised.
2. PROOF OF CLAIM that Equifax, Inc. did NOT know of said data breach six months before reporting said data breach on September 8, 2017.
3. PROOF OF CLAIM that Equifax, Inc. did NOT intentionally try to cover up the data breach only to be forced to reveal said data breach six months after the breach actually occurred.
4. PROOF OF CLAIM that Equifax, Inc. protected my personal data and did NOT allow my personal data to be breached and stolen by unknown entities.
5. PROOF OF CLAIM that Equifax, Inc. knows exactly where the personal data of 148 Million Americans is.
6. PROOF OF CLAIM that Equifax, Inc. knows exactly who stole the personal data of 148 Million Americans.
7. PROOF OF CLAIM that Equifax, Inc. is NOT liable to the 148 Million Americans whose data was stolen as a result of the data breach at Equifax, Inc. reported on September 8, 2017.
8. PROOF OF CLAIM that Equifax, Inc. HAS corrected ALL security lapses and has taken ALL security measures possible to ensure that this data breach will not happen again.



Conditional Acceptance # CA-010819-EQUIFAX

9. PROOF OF CLAIM that the U.S. General Accounting Office (GAO) did NOT on September 8, 2018 release a comprehensive report examining the reasons for the massive breach of personal information from Equifax, Inc.

10. PROOF OF CLAIM that the U.S. General Accounting Office (GAO) report did NOT summarize an array of errors inside the company, largely related to a failure to use well-known security best practices and a lack of internal controls and routine security reviews.

11. PROOF OF CLAIM that through the fraudulent data breach at Equifax, Inc I have NOT been personally injured and my ability to obtain credit has NOT been negatively affected resulting in economic hardships.

12. PROOF OF CLAIM that Equifax, Inc is NOT liable to me for damages no less than a minimum of \$75,000,000.00 Seventy Five Million Dollars including triple damages and costs.

The undersigned must ask, "What is my remedy?"

The undersigned respectfully requests that you, Equifax, Inc. reply within ten (10) days by providing Proof of Claim for all twelve items, both to the undersigned and to the Notary's address below.

A non-response and or failure to provide Proof of Claim will constitute agreement by you, and that the undersigned can exercise the remedy provided by all applicable laws, federal, state and local. Your non-response will equate to commercial acquiescence to the terms outlined by the undersigned in a final Affidavit and Notice of Default.

Sincerely,  
Without Prejudice

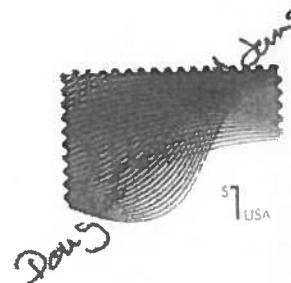
Douglas Emery Adams

#### ACKNOWLEDGEMENT

As a Notary Public for said County and State, I do hereby certify that on this 25 day of March, 2019, that Douglas Emery Adams, the above mentioned, appeared before me and executed the foregoing. Witness my hand and seal:

Kirsten N. Chou  
Notary Public  
My commission expires 10-09-2022

Third Party address (Notary):  
Kirsten N. Chou  
7801 Alma Drive #105  
Plano, Texas 75025



**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

**Mark Begor, CEO**  
EQUIFAX, INC.  
1550 PEACHTREE ST NW  
ATLANTA, GA, 30309-2468

Barcode: 9590 9402 4577 8278 7858 51

2. Article Number (Machine)

7018 2290 0002 2315 0271

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name) *[Signature]* C. Date of Delivery *3/25/19*

D. Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

Service Type ☐ Priority Mail Express®  
☐ Adult Signature ☐ Registered Mail™  
☐ Adult Signature Restricted Delivery ☐ Registered Mail Restricted Delivery  
☐ Certified Mail® ☐ Return Receipt for Merchandise  
☐ Certified Mail Restricted Delivery ☐ Signature Confirmation™  
☐ Collect on Delivery ☐ Signature Confirmation Restricted Delivery  
☐ Insured Mail Restricted Delivery (over \$500)

3/19 Page 9 of 15

NORTHWEST PLANO  
3905 HEDGCOKE RD  
PLANO  
TX

75025-9998

4871130016

03/25/2019 (800)275-8777 9:13 AM

Product Description	Sale Qty	Final Price
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First-Class Mail Large Envelope	1	\$1.15
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(Domestic)  
(ATLANTA, GA 30309)  
(Weight: 0 Lb 1.10 Oz)  
(Estimated Delivery Date)  
(Thursday 03/28/2019)

Certified	1	\$3.50
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(®USPS Certified Mail #)  
(70182290000223150271)

Return Receipt	1	\$2.80
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(®USPS Return Receipt #)  
(70182290000223150271)

Total		\$7.45
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Debit Card Remittance		\$7.45
-----------------------	--	--------

(Card Name: Debit Card)  
(Account #: XXXX XXXXXX3742)  
(Approval #: )  
(Transaction #: 201)  
(Receipt #: 020136)  
(Debit Card Purchase: \$7.45)  
(Cash Back: \$0.00)

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit [www.usps.com](http://www.usps.com) USPS Tracking or call 1-800-222-1811.

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ATLANTA, GA 30309

**OFFICIAL USE**

Certified Mail Fee \$3.50  
Postage \$1.15  
Total Postage and Fees \$7.45

Extra Services & Fees (check box, add fee if appropriate)  
☐ Return Receipt (hardcopy) \$0.00  
☐ Return Receipt (electronic) \$0.00  
☐ Certified Mail Restricted Delivery \$0.00  
☐ Adult Signature Required \$0.00  
☐ Adult Signature Restricted Delivery \$0.00

Postmark Here  
03/25/2019

Sent To Mark Begor % Equifax Inc  
Street and Apt. No., or PO Box No.  
1550 Peachtree St NW  
Atlanta GA 30309-2468  
ZIP+4

PS Form 3800, April 2015 PSN 7530-02-000-9053 See Reverse for Instructions

Conditional Acceptance # CA 010819-EQUIFAX

#2

Certified Mail No. 7018 1830 0000 0042 7342

Thursday, April 4, 2019

To: Mark Begor, CEO  
EQUIFAX, INC.  
1550 PEACHTREE ST NW  
ATLANTA, GA, 30309-2468

From: Douglas-Emery: Adams  
519 Colgate Drive  
Allen, Texas [ 75013 ]  
Non-Domestic / Non Assumpsit

RE: CONDITIONAL ACCEPTANCE (CA) - REQUEST FOR PROOF OF CLAIM AS TO THE LIABILITY OF EQUIFAX, INC. FOR THE FRAUDULENT BREACH OF THE PERSONAL DATA OF 148 MILLION AMERICANS INCLUDING MYSELF, THE UNDERSIGNED, AS REPORTED ON SEPTEMBER 8, 2017 BY EQUIFAX, INC.

**Notice of Fault and Opportunity to Cure and Contest Acceptance**

Dear Equifax, Inc:

The undersigned caused to be sent to you a CONDITIONAL ACCEPTANCE FOR PROOF OF CLAIM (CA), sent you on March 25th, 2019.

You failed to perform after receiving these presentments and you failed to perform by providing the requested and necessary PROOFS OF CLAIM after receiving the said Conditional Acceptance from the undersigned.


As the Respondent, you are now in fault and you are in agreement and have stipulated to the terms of the undersigned's dated presentment through your dishonor. You have the right to cure this fault and perform according to said terms within the ten (10) days from the postmark of this Notice.

Should you fail to cure your fault, I will establish an affidavit of default, agreement and failure to contest acceptance, and obtain a FINAL AFFIDAVIT OF CERTIFICATE OF NON-RESPONSE pursuant to and relative to UCC, State Statute, Federal Laws and otherwise.

Thank you for your prompt attention to this matter.

I declare under penalty of Perjury WITHOUT the United States that the above is the truth the whole truth and nothing but the truth to the best of my knowledge and overstanding.

Sincerely,  
Without Prejudice



Third Party address (Notary):  
Kirsten N. Chou  
7801 Alma Drive #105  
Plano, Texas 75025

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p><b>Mark Begor, CEO</b>  <b>EQUIFAX, INC.</b>  <b>1550 PEACHTREE ST NW</b>  <b>ATLANTA, GA, 30309-2468</b></p> <p>7018 1830 0000 0042 7324</p>	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Address</p> <p>B. Received by (Printed Name) <b>Lewis</b> C. Date of Delivery <b>4/11/19</b></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No          If YES, enter delivery address below:</p> <p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™  <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restrict Delivery  <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation  <input type="checkbox"/> Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery          all Restricted Delivery (over \$500)</p>

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

NORTHWEST PLANO  
 3905 HEDGCOXE RD  
 PLANO  
 TX  
 75025-9900  
 4871130000  
 04/04/2019 (800)2 8777 8:48 AM

Product Description	Sale Qty	Final Price
First-Class Mail Large Envelope (Domestic)	1	\$1.00
(ATLANTA, GA 30309)		
(Weight: 0 Lb 0.90 Oz)		
(Estimated Delivery Date)		
(Monday 04/08/2019)		
Certified	1	\$3.50
(USPS Certified Mail #)		
(7018183000000427324)		
Return Receipt	1	\$2.80
(USPS Return Receipt #)		
(9590940247098323226787)		

Total \$7.30

Credit Card Remitd \$7.30

(Card Name: VISA)  
 (Account #: XXXXXXXXXXXX0124)  
 (Approval #: 004757)  
 (Transaction #: 817)  
 (ATD: A0000000031010 Chip)  
 (AL: VISA CREDIT)  
 (PIN: Not Required)

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit [www.usps.com](http://www.usps.com) USPS Tracking or call 1-800-222-1811.

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7018 1830 0000 0042 7324

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ATLANTA, GA 30309

**OFFICIAL USE**

Certified Mail Fee	\$3.50	0016
Extra Services & Fees (check box, add fee to total)	\$2.80	17
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$1.00	
Total Postage and Fees	\$7.30	04/04/2019

Sent To **Mark Begor, CEO**  
 Street and Apt. No., or PO Box No. **Equifax, Inc. 1550 Peachtree St. N.**  
 City, State, ZIP+4® **Atlanta GA 30309-2468**

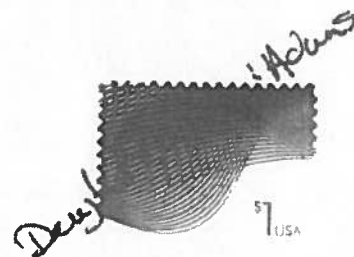
PS Form 3800, April 2015 PSN 7530-02-000-9053 See Reverse for Instructions



Conditional Acceptance # CA-010819-EQUIFAX

#3

Certified Mail No. 7018 1830 0000 0042 7348



Monday, April 15, 2019

To: Mark Begor, CEO  
EQUIFAX, INC.  
1550 PEACHTREE ST NW  
ATLANTA, GA, 30309-2468

From: Douglas-Emery: Adams  
519 Colgate Drive  
Allen, Texas [ 75013 ]  
Non-Domestic / Non Assumpsit

RE: CONDITIONAL ACCEPTANCE (CA) - REQUEST FOR PROOF OF CLAIM AS TO THE LIABILITY OF EQUIFAX, INC. FOR THE FRAUDULENT BREACH OF THE PERSONAL DATA OF 148 MILLION AMERICANS INCLUDING MYSELF, THE UNDERSIGNED, AS REPORTED ON SEPTEMBER 8, 2017 BY EQUIFAX, INC.

**AFFIDAVIT AND NOTICE OF DEFAULT**

State of Texas )  
 ) ss  
County of Collin )

**NOTICE TO AGENT IS NOTICE TO PRINCIPAL  
NOTICE TO PRINCIPAL IS NOTICE TO AGENT**

**"Indeed, no more than (affidavits) is necessary to make the prima facie case."  
United States v. Kis, 658 F.2nd, 526, 536 (7th Cir. 1981); Cert Denied, 50 U.S. L.W.  
2169; S.Ct. March 22, 1982**

I, Mike M. Lewis, herein 'Affiant,' a living breathing man/woman, being first duly sworn, depose, say and declare by my signature that the following facts are true, correct and complete to the best of my knowledge and belief.

1. THAT, Affiant is competent to state the matters included in his/her declaration, has knowledge of the facts, and declares that to the best of his/her knowledge, the statements made in his affidavit are true, correct, and not meant to mislead.

2. THAT, Affiant (via Notary) sent a Conditional Acceptance requesting Proofs of Claim to Equifax, Inc. on March 25th, 2019.

3. THAT, Respondent, Equifax, Inc., is herein addressed in its public capacity as a Corporation and hereinafter collectively referred to as "Respondent".

4. THAT, Equifax, Inc. has willingly, knowingly, intentionally, or voluntarily agreed and acquiesced through its non-response to the facts stated herein.

5. THAT, on September 8, 2017 Equifax, Inc. DID report that over 148 Million Americans' personal data housed by Equifax, Inc. had been stolen and/or compromised.

6. THAT, Equifax, Inc. DID know of said data breach six months before reporting said data breach on September 8, 2017.

Conditional Acceptance # CA-010819-EQUIFAX

7. THAT, Equifax, Inc. DID intentionally try to cover up the data breach only to be forced to reveal said data breach six months after the breach actually occurred.

8. THAT, Equifax, Inc. DID NOT protect my personal data and DID allow my personal data to be breached and stolen by unknown entities.

9. THAT, Equifax, Inc. DOES NOT know exactly where the personal data of 148 Million Americans is.

10. THAT, Equifax, Inc. DOES NOT know exactly who stole the personal data of 148 Million Americans.

11. THAT, Equifax, Inc. IS liable to the 148 Million Americans whose data was stolen as a result of the data breach at Equifax, Inc. reported on September 8, 2017.

12. THAT, Equifax, Inc. HAS NOT corrected ALL security lapses and has NOT taken ALL security measures possible to ensure that this data breach will not happen again.

13. THAT, the U.S. General Accounting Office (GAO) DID on September 8, 2018 release a comprehensive report examining the reasons for the massive breach of personal information from Equifax, Inc.

14. THAT, the U.S. General Accounting Office (GAO) report DID summarize an array of errors inside the company, largely related to a failure to use well-known security best practices and a lack of internal controls and routine security reviews.

15. THAT Equifax, Inc. CONTINUES to subject 148 Million Americans to the risk of having their personal data compromised and/or stolen again.

16. THAT Equifax, Inc. HAS personally injured me and my ability to obtain credit resulting in economic hardship.

17. THAT Equifax, Inc. IS liable to me and each of the 148 Million Americans for damages no less than a minimum of \$75,000,000.00 Seventy-Five Million Dollars including triple and punitive damages and costs.

Further Affiant sayeth not.

Dated this Monday, April 15, 2019

Sincerely,  
Without Prejudice

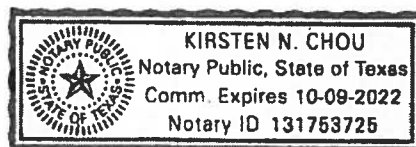
Douglas-Emery Adams

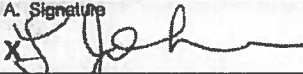
*Don*  
*Emery*  
\$1 USA

#### ACKNOWLEDGEMENT

As a Notary Public for said County and State, I do hereby certify that on this 15 day of April, 2019 that Douglas-Emery Adams the above mentioned, appeared before me and executed the foregoing. Witness my hand and seal:

Kirsten N. Chou  
Notary Public  
My Commission expires 10-09-2022



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<p>■ Complete Items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p><b>Mark Begor, CEO</b>  <b>EQUIFAX, INC.</b>  <b>1550 Peachtree Street NW</b>  <b>ATLANTA, GA, 30309-2468</b></p> <p>9590 9402 4709 8323 2267 70</p> <p>2. Article Number (Transfer from previous label)</p> <p>7018 1830 0000 0042 7348</p>	<p>A. Signature   <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)  <b>Mark Begor</b></p> <p>C. Date of Delivery  <b>4-22-19</b></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Mail		<input type="checkbox"/> Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise																
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<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Mail																	
<input type="checkbox"/> Mail Restricted Delivery (over \$500)																	

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

FRISCO  
8700 STONEBROOK PKWY  
FRISCO  
TX  
75034-9998  
4833050034  
(800) 275-8777 10:02 AM

04/16/2019

Product Description	Sale Qty	Final Price
First-Class Mail Large Envelope (Domestic) (ATLANTA, GA 30309) (Weight: 0 Lb 1.70 Oz) (Estimated Delivery Date) (Friday 04/19/2019)	1	\$1.15
Certified Mail (2USPS Certified Mail #) (70181830000000427348)	1	\$3.50
Return Receipt (2USPS Return Receipt #) (9590940247098323226770)	1	\$2.80
<b>Total</b>		<b>\$7.45</b>

Debit Card Remit'd (\$7.45)  
(Card Name: VISA)  
(Account #: XXXXXXXXXXXX3742)  
(Approval #: )  
(Transaction #: 252)  
(Receipt #: 017475)  
(Debit Card Purchase: \$7.45)  
(Cash Back: \$0.00)  
(AID: A0000000980840 Chip)  
(AL: US DEBIT)  
(PIN: Verified)

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit [www.usps.com](http://www.usps.com) USPS Tracking or call 1-800-222-1811.

In a hurry? Self-service kiosks offer quick and easy check-out. Any Retail Associate can show you how.

U.S. Postal Service™  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

ATLANTA, GA 30309

Official Use

Certified Mail Fee \$3.50

Extra Services & Fees (check box, add fee to postage)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$1.15

Total Postage and Fees \$7.45

Sent To **Mark Begor, CEO**  
Street and Apt. No. or PO Box No. **1550 Peachtree Street NW**  
City, State, ZIP+4® **Atlanta, GA 30309-2468**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



#4

## AFFIDAVIT OF CERTIFICATE OF NON-RESPONSE

State of Texas )  
 County of Collin ) ss

Day  
 Adam

Re: Non-Response to Private Conditional Acceptance for Proof of Claim to Exhaust a Private Administrative Remedy initiated by Douglas - Emery Adams

"Indeed, no more than (affidavits) is necessary to make the prima facie case." United States vs Kis, 658 F.2nd, 526, 536 (7th Cir. 1981); Cert Denied, 50 U.S. L.W. 2169; S. Ct. March 22, 1982

That I, Kirsten N. Chou (Notary), a living breathing man (or woman), being first duly sworn, depose and say and declare by my signature that the following facts are true to the best of my knowledge and belief.

I, Kirsten N. Chou (Notary), the undersigned, a Third Party, not a party to the matter, certify that a Conditional Acceptance and Request for Proof of Claim was sent by the undersigned to Equifax, Inc. via Certified Mail Number 7018 2290 0002 2315 on March 25<sup>th</sup>, 2019.

I, Kirsten N. Chou (Notary), the undersigned, a Third Party, not a party to the matter, certify that a Notice of Fault and Opportunity to Cure was sent by the undersigned to Equifax, Inc. via Certified Mail Number 7018 1830 0000 0042 1324 on April 4<sup>th</sup>, 2019.

I certify that I have reviewed the original documents of the above party and the mail receipts for the mailings.

Per the documents as mailed, request was made to the Respondent to send a RESPONSE being the requested Proof of Claim(s) to the above party and to the undersigned's address/office. As the Conditional Acceptance and Notice of Fault and Opportunity to Cure were presented, Respondent failed to cure the Fault. An affidavit in support of the default was executed in the matter.

Therein, no such RESPONSE was sent and/or received at the undersigned's address/office for conclusion to the above party's private administrative process.

Said RESPONSE was requested within a specific time period (10 DAYS) with an additional 3 days for return mail per each document.

THEREFORE; I, Kirsten N. Chou (Notary) certify that the Respondent, Equifax, Inc., refused or failed to RESPOND to the above party's Private Conditional Acceptance and Request for Proof of Claim, and failed to cure within the time stipulated under necessity, and therefore is in full agreement.

Dated this 25 day of June, 2019  
 Without Prejudice

Kirsten N. Chou  
 Notary

Douglas Emery Adams  
 Referenced Party

